

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF TEXAS – HOUSTON DIVISION**

United States Courts  
Southern District of Texas  
**FILED**

**NOV 13 2025**

**Case No. 4:25-cv-03231**

**Nathan Ochsner, Clerk of Court**

**Brandon–Meion : Brown© and Peter–Eugene : Alvarado©**

**Plaintiffs**

**v.**

**Brazoria County Sheriff's Office, Brazoria Independent School District Police  
Department,**

**Lighthouse Learning Center, and Captain M. Crittenden**

**Defendants**

**AMENDED COMPLAINT**

I. JURISDICTION AND VENUE This Court holds jurisdiction under 28 U.S.C. §§ 1331, 1343, and 1333(1) within the admiralty and maritime jurisdiction of the United States. This matter also arises under federal law pursuant to the Americans with Disabilities Act (42 U.S.C. §12132), the Individuals with Disabilities Education Act (20 U.S.C. §1400 et seq.), and 42 U.S.C. §1983. Venue is proper within the Southern District of Texas as all material events transpired within Brazoria and Harris Counties, Texas. II. STATEMENT OF FACTS Plaintiff Peter–Eugene : Alvarado©, a disabled minor, underwent critical heart surgery between February and March 2025. Subsequent to his procedure, he was detained by agents of the Brazoria Independent School District (BISD) Police and the Brazoria County Sheriff's Office without medical clearance or proper ADA accommodations. During his attendance at the Lighthouse Learning Center—a BISD special education facility—school administrators failed to provide federally mandated support and supervision, leading to deprivation of rights and maritime custodial endangerment. The Defendants collectively acted with deliberate indifference to Plaintiff's federally protected rights under the ADA, IDEA, and maritime civil authority. Their conduct resulted in physical and emotional distress, medical neglect, and educational deprivation in violation of established federal statutes. III. CAUSES OF ACTION 1. Violation of the Americans with Disabilities Act, 42 U.S.C. §12132, for failure to accommodate a known disability. 2. Violation of the Individuals with Disabilities Education Act, 20 U.S.C. §1400 et seq., for failure to provide appropriate educational and safety measures.

3. Violation of Civil Rights under 42 U.S.C. §1983 for deprivation of liberty, due process, and equal protection. 4. Maritime negligence and custodial endangerment under 28 U.S.C. §1333. IV. PRAYER FOR RELIEF WHEREFORE, Plaintiffs respectfully request judgment in their favor and against the Defendants as follows: a. Compensatory damages of \$7–12 million for physical, emotional, and educational injury; b. Punitive damages for reckless disregard of federally protected rights; c. Declaratory judgment affirming the violations of ADA, IDEA, and maritime law; d. Injunctive relief requiring systemic reform and accountability measures; e. Costs of suit, interest, and any further relief deemed just and proper by the Court. Plaintiff demands trial by jury. Respectfully submitted this 28th day of October, 2025.

Brandon-Meion : Brown © the se Plaintiff and Next Friend

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Notary Acknowledgment: \_\_\_\_\_